

# **EXHIBIT 5**

	A	B	E	R	S
1	INVALIDITY ANALYSIS OF JOHNSON ET AL. U.S. PATENTS 6,023,683, 6,055,516, AND 6,505,172				
2					
3	Citations to references are exemplary only and not intended to be exhaustive.				
4	A cell with tan shading indicated content obtained from another cell				
5	A cell with light green shading indicates a claim element that is anticipated by the reference in its column (possibly also asserted to be obvious)				
6	A cell with light yellow shading indicates a claim element that is not asserted to be anticipated by the reference in its column but is obvious				
7	A cell with light blue shading indicates a claim as a whole that is invalid for reasons other than §102 or §103.				
8	A cell with gray shading indicates matter appearing in Lawson interrogatory responses but not adopted by Dr. Shamos.				
9	A cell with rose shading indicates an element or step that is not found in the reference				
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11	ASSERTED CLAIMS	DEPENDENCY	AS CONSTRUED		
12				J-CON (per supplemental invalidity defenses)	Shamos opinion re J-CON
13					
14	*172 Patent				
15	1. An electronic sourcing system comprising:	1P	An electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors, comprising:	J-CON is an electronic sourcing system. (L0123423).	<p>J-CON is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors</p> <p>(Retail) Locating items is disclosed, e.g., at L012360: "PartFinder is J-CON's electronic parts catalog. Use it with Point-of-Sale (POS) to look up the parts a customer wants and put them on the ticket."</p> <p>Purchasing items is disclosed, e.g., at L0123459 et seq. ("Start the Sale"). (Dealer) Sourcing for inventory is disclosed, e.g., at L0123681 et seq. (Purchasing and Receiving) and, e.g., at L0123964 et seq. (Inventory Information).</p> <p>Multiple vendors are disclosed: "ORDER BY CODE. If the manufacturers parts are ordered from one vendor (by line) enter "L" multiple vendors (by subline), enter "S" ... If you have second and third choices for vendors enter their vendor numbers." L0125080</p> <p>"Adding and Editing Vendors. Most of your vendors were added when your system was set up. When you add new vendor most prompts you receive are self-explanatory." L0125142</p> <p>Claim 1 is anticipated by J-CON.</p>
16				J-CON renders claim 1 obvious when combined with the Fisher RIMS system, Doyle, P.O. Writer, SABRE, the Gateway system, or the IBM TV 12 system.	

	A	B	E	R	S
11	ASSERTED CLAIMS	DEPENDENCY	AS CONSTRUED		
12				J-CON (per supplemental invalidity defenses)	Shamos opinion re J-CON
13	a database containing data relating to items associated with at least two vendors maintained so that selected portions of the database may be searched separately	1a	a database containing data relating to items associated with at least two vendors maintained so that selected portions of the database may be searched separately		<p>To the extent that ePlus contends that this limitation is met by Lawson's accused system, i.e., that restricting a search by vendor number constitutes searching a "separate portion," this limitation is also met by J-CON and Lawson's prior art system.</p> <p>J-CON maintained a database of items. "J-CON's Point-of-Sale/total Recall uses the latest Relational Database (RDB) technology so that even the most inexperienced counterperson can quickly and accurately enter sales and print tickets." L0123449. Different portions of the database could be searched separately.</p> <p>J-CON's database contained products of multiple vendors. L0123693</p> <p>J-CON also maintained a PartFinder database. L0123658</p> <p>J-CON further made use of a PartSource database: "PartSource is a licensed product from CCI that uses Relational Database (RDB) technology to give you price sheet prices and the correct selling price for parts that are not in your JIF." L0123472.</p>
17	means for entering product information that at least partially describes at least one desired item	1b	<p>Function: entering product information that at least partially describes at least one desired item</p> <p>Structure: user interface operating on a computer through which a user may provide input; and one or more software modules that provide product information describing an item or a combination thereof, and their equivalents. See e. g. , '172 Patent at 4:6-6:28; 7:66-8:19; 9:55-12:28; 18:23-50; FIGS. 1-2 (describing local computer 20, graphical interface 254, search program 50, interface 60, TV/2 and search program 250)</p>	J-CON included mechanisms and screen displays for entering product information that was descriptive of items in the parts database. (L0123613).	<p>J-CON discloses a means for entering product information that at least partially describes at least one desired item. Line items (desired items) are partially described on a display screen by specifying fields of information, e.g., manufacturer code, part number, list price, unit price and/or cost. L0123471.</p> <p>The "user interface" is the display screen.</p> <p>In PartSource, items can be partially described via wildcards: "With PartSource you can use wild' cards if you do not know the manufacturer or part number. Wild cards are characters-asterisk and question mark-that stand for any other character that may appear in the same place. The question mark (?) replaces anyone character, and the asterisk (*) replaces zero or more characters." L0123472.</p>
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19					



	A	B	E	R	S
	ASSERTED CLAIMS	DEPENDENCY	AS CONSTRUED	J-CON (per supplemental invalidity defenses)	Shamos opinion re J-CON
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12					
13	means for searching for matching items that match the entered product information in the selected portions of the database	1c	<p>Function: searching for search results that match the entered product information in the selected portions of the database</p> <p>Structure: search programs and modules operating on a computer system with access to data in a database or other file system, and their equivalents. See e.g., '172 Patent at 4:6-6:28; 7:66-8:19; 9:55-12:41; FIGS. 1-2; Appendices III-V and VIII (describing local computer 20, search program 50, TV/2 and search program 250)</p> <p>SAME STRUCTURE AS IN MEANS IN '683 3, 6</p>	J-CON included a search program for matching items in a database in response to the descriptive information entered by the user. (L0123472).	<p>The reference discloses a means for searching for search results (a search program) that match the entered product information in the selected portions of the database: "PART-FINDER is J-CON's electronic catalog system that you use together with Point-Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PART-FINDER, you can forget those time-consuming searches through manufacturer catalogs. Instead, you can look up parts in seconds with just a few clicks of the keyboard. When you find what your customer wants, PART-FINDER puts the parts on the ticket for you." L0124897. A list of responsive search results is shown at L0124911.</p> <p>A database is disclosed for searching: "You use PART-FINDER Maintenance to customize and update your PART-FINDER database." L0124947</p>
20	means for generating an order list that includes at least one matching item selected by said means for searching	1d	<p>Function: generating a list of desired catalog items that includes at least one search result selected by said means for searching</p> <p>Structure: user interface operating on a computer through which a user may select from results from a search program or a search program that generates a list of desired catalog items, and their equivalents. See e.g., '172 Patent at 4:6-6:28; 7:66-8:13; 9:55-12:28; 18:23-50; Appendix VI, FIGS. 1-2 (describing local computer 20, graphical interface 254, search program 50, interface 60, TV/2 and search program 250)</p>	J-CON created list of parts meeting a specific criteria in which a user could select parts and quantities to purchase. (L0123603 & L0123610-11).	<p>The reference discloses a means for generating a list of desired catalog items that includes at least one search result selected by said means for searching</p> <p>Desired items returned by the search program are selected for inclusion in an order list as described at L0124915: "You select a part by entering its selection number at the SELECTION field. PART-FINDER then displays the number on vehicle for the part at the QUANTITY field. If you want to sell the quantity displayed, you press &lt;RETURN&gt;. Otherwise, you can enter a different quantity."</p> <p>(3) An order list of selected items and cost data is shown at L0124916.</p> <p>The user interface is a screen that displays the SELECTION field.</p>
21	means for building a requisition that uses data obtained from said database relating to selected matching items on said order list	1e	<p>Function: building a requisition that uses data obtained from said database relating to requisition items on said list of desired catalog items</p> <p>Structure: requisition module operating on a computer system having access to data in the database, and its equivalents. See e.g., '172 Patent at 1:30-40; 3:7-28; 6:45- 7:3; 7:41-8:19; FIGS 1-3 (describing various embodiments of requisition modules including requisition/purchasing system 40, requisition management ("REQI") module 44A and requisition maintenance program 44C)</p> <p>NOTE: SAME AS MEANS IN '683, 3, 6</p>	J-CON enabled a user to select items to add to a requisition (ticket). (L0123606).	<p>The reference discloses a means for building a requisition that uses data obtained from said database relating to requisition items on said list of desired catalog items.</p> <p>The reference discloses transferring data relating to selected matching items included on an order list to a requisition module: "When you return to Point-Of-Sale from PART-FINDER, J-CON automatically places all parts you selected with PART-FINDER on a ticket." L0124919. The ticket causes a purchase order for parts needed by a customer to be generated (built) when the ticket is finalized: "Only when the held ticket is finalized does J-CON process it." L0124797. The ticket is the requisition.</p> <p>The requisition module has access to data in the database: "PartFinder is J-CON's electronic parts catalog. Use it with Point-of-Sale (POS) to look up the parts customer wants and put them on the ticket." L0123601</p>
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11	ASSERTED CLAIMS	DEPENDENCY	AS CONSTRUED		
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13	means for processing said requisition to generate purchase orders for said selected matching items.	1f	<p>Function: processing a requisition to generate purchase orders for requisition items</p> <p>Structure: purchase order generation module operating on a computer system having access to the requisition, and its equivalents. See e.g., '172 Patent at 1:42-55; 3:23-28; 10:53-55; 15:39-61; FIGS 1-3 (describing systems and processes that operate to generate purchase orders including requisition/purchasing system 40)</p> <p>NOTE SAME AS MEANS IN '683 3, 6</p>	J-CON could be configured to process purchase orders manually or automatically. (L0123693-99).	<p>The reference discloses a means for processing a requisition to generate purchase orders for requisition items.</p> <p>A purchase order generation module for generating purchase orders is disclosed at L0125131-3, e.g., "Once you fine-tune the buying instructions that you've set up for J-CON you can let J-CON automatically compute and send POs during End-of-Day EOD." L0125131. "You can set up J-CON to automatically compute POs during EOD. You can also set it to automatically transmit POs to vendors who use A-DIS." L0123693</p> <p>The module has access to the requisition (ticket): "When you compute PO for primary or alternate vendor J-CON checks each manufacturer to see which ones should be ordered from the vendor. It then checks every part from each of those manufacturers to see which ones need to be ordered." L0123695</p>
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24	516 Patent				
25	1. An electronic sourcing system comprising:	1P	An electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors, comprising:	J-CON is an electronic sourcing system. (L0123423).	<p>J-CON is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors</p> <p>(Retail) Locating items is disclosed, e.g., at L012360: "PartFinder is J-CON's electronic parts catalog. Use it with Point-of-Sale (POS) to look up the parts a customer wants and put them on the ticket."</p> <p>Purchasing items is disclosed, e.g., at L0123459 et seq. ("Start the Sale"). (Dealer) Sourcing for inventory is disclosed, e.g., at L0123681 et seq. (Purchasing and Receiving) and, e.g., at L0123964 et seq. (Inventory Information).</p> <p>Multiple vendors are disclosed: "ORDER BY CODE. If the manufacturers parts are ordered from one vendor (by line) enter "L" multiple vendors (by subline), enter "S" ... If you have second and third choices for vendors enter their vendor numbers." L0125080</p> <p>"Adding and Editing Vendors. Most of your vendors were added when your system was set up. When you add new vendor most prompts you receive are self-explanatory." L0125142</p> <p>Claim 1 is anticipated by J-CON.</p>
26				<p>J-CON renders claim 1 obvious when combined with the Fisher RIMS system, King, P.O. Writer, SABRE, or the Gateway system.</p> <p>Additionally, J-CON renders claim 1 obvious when combined with Doyle and with the Fisher RIMS system, King, P.O. Writer, SABRE, or the Gateway system.</p> <p>Additionally, J-CON renders claim 1 obvious when combined with the IBM TV/2 system and with the Fisher RIMS system, King, P.O. Writer, SABRE, or the Gateway system.</p>	



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11	ASSERTED CLAIMS	DEPENDENCY	AS CONSTRUED		
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	a collection of catalogs of items stored in an electronic format;	1a	a collection of organized collections of items and associated information, published by a vendor (which includes suppliers, manufacturers, and distributors), which preferably includes a part number, price, catalog number, vendor name, vendor ID, a textual description of the item, and images of or relating to the item stored in an electronic format;		<p>The J-CON system maintained automotive parts information from multiple manufacturers and multiple vendors in an electronic database, including such information as part number, auto make, model, and year, engine size, subassembly, product description, inventory status, price, manufacturer, distributor(s), and unit of measurement. The J-CON system included the information previously maintained by automotive parts stores in a large collection of printed automotive parts catalogs.</p> <p>"PART-FINDER is J-CONs electronic catalog system that you use together with Point-Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PARTFINDER you can forget those time consuming searches through manufacturer catalogs" L0124897.</p> <p>Changing catalogs is described at L0124922. Therefore, J-CON included a collection of catalogs.</p>
27	a first set of pre-determined criteria associated with said collection of catalogs.	1b	a first set of pre-determined criteria associated with said collection of organized collections;		<p>To the extent that ePlus contends the limitation to be met by Lawson's accused system, i.e., that the ability to search for products of specific vendors is sufficient, then the limitation is also met by J-CON and Lawson's prior art system.</p> <p>If "first set of pre-determined criteria" means restriction to specific catalogs, then searches may be limited by manufacturer. "You might want to search for InterChange parts by manufacturer instead of by group. When you search by manufacturer you can select one or more manufacturers to search. To search by manufacturer press Mfgs or Enter to leave the GROUP field blank and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to search." L0123624.</p>
28	a second set of pre-determined criteria associated with items from each of said catalogs;	1c	a second set of pre-determined criteria associated with items from each of said organized collections;	J-CON included mechanisms and screen displays for entering product information that was descriptive of items in the parts database. (L0123613).	<p>If "second set of pre-determined criteria" means restriction to types of items, then items can be searched by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. "The Part Index is an alphabetized list of parts that gives each parts group and subgroup. There are two ways to find a part in the Part Index. Press Index at the GROUP SUBGROUP or SELECTION field. At SEARCH FOR enter part or all of the part name. The more letters you enter the more accurate the search will be." L0123609.</p> <p>J-CON also provided for wildcard searching: "When you use wild card and PartSource finds more than one part that matches it displays all the parts along with their descriptions and list prices." L0123473.</p>
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	A	B	E	R	S
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13					
	a catalog selection protocol, said catalog selection protocol relying on said first set of predetermined criteria to select less than said entire collection of catalogs, and including matching a vendor identification code with a subset of said collection of catalogs, wherein said subset of catalogs includes both a vendor catalog from a predetermined vendor and a second catalog from a predetermined third party that is one of a manufacturer and a competing vendor, said predetermined third party selling items corresponding to items in said vendor catalog; and	1d	an organized collection selection procedure, said procedure relying on said first set of predetermined criteria to select less than said entire collection of organized collections, and including matching a vendor identification code with a set of less than all of said collection of organized collections, wherein said set of organized collections includes both a vendor organized collection from a predetermined vendor and a second organized collection from a predetermined third party that is one of a manufacturer and a competing vendor, said predetermined third party selling items corresponding to items in said vendor organized collection; and		<p>*You might want to search for InterChange parts by manufacturer instead of by group. When you search by manufacturer you can select one or more manufacturers to search. To search by manufacturer press Mfgs or Enter to leave the GROUP field blank and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to search." L0123624.</p> <p>The purpose of InterChange was to allow selection from among competitive items from multiple sources.</p>
30	a search program, said search program relying on said second set of criteria to select specific items from said catalogs determined from said catalog selection protocol.	1e	a search program, said search program relying on said second set of criteria to select specific items from said organized collections determined from said organized collection selection procedure.	J-CON included a search program for matching items in a database in response to the descriptive information entered by the user. (L0123472).	<p>J-CON included a search program for selecting specific items. Line items (desired items) are partially described on a point-of-sale screen by specifying fields of information, e.g., manufacturer code, part number, list price, unit price and/or cost. L0123471.</p> <p>"Once you've entered the part number of the competitive part you have J-CON search for the InterChange part. You can look up InterChange parts by PartFinder group or by manufacturer." L0123623.</p> <p>See also '172 1c.</p>
31	2. An electronic sourcing system as recited in claim 1, wherein catalogs comprising said collection of catalogs are stored in separate databases.		2. A system as recited in claim 1, wherein organized collections comprising said collection of organized collections are stored in separate databases.	<p>J-CON renders claim 2 obvious when combined with the Fisher RIMS system or King.</p> <p>Additionally, J-CON renders claim 2 obvious when combined with P.O. Writer and the Fisher RIMS system or King.</p> <p>Additionally, J-CON renders claim 2 obvious when combined with SABRE and the Fisher RIMS system or King.</p> <p>Additionally, J-CON renders claim 2 obvious when combined with the Gateway system and the Fisher RIMS system or King.</p>	<p>To the extent Plaintiff contends that Lawson's accused system meets this limitation, so does J-CON and Lawson's prior art system.</p> <p>In my opinion, this limitation is not disclosed in the reference, but it would have been obvious to store catalogs of different vendors in separate databases because the catalogs originate from different vendors and would not be provided in the same format.</p> <p>Claim 2 is anticipated by J-CON based on Plaintiff's infringement contentions. Claim 2 is obvious in view of J-CON.</p>
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11	ASSERTED CLAIMS	DEPENDENCY	AS CONSTRUED	J-CON (per supplemental invalidity defenses)	Shamos opinion re J-CON
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	6. An electronic sourcing system as recited in claim 1, wherein said second set of predetermined criteria includes at least one of a catalog number and item textual information.		6. An system as recited in claim 1, wherein said second set of predetermined criteria includes at least one of an organized collection number and item textual information.	J-CON enabled a user to enter part numbers as a basis for searching the database for desired items. (L0123625).  J-CON system renders claim 6 obvious when combined with the other cited prior art references as described with respect to claim 1.	J-CON enabled a user to search by part number (catalog number). L0123625. J-CON also enabled searching by textual description: "At the SEARCH FOR field you can enter the first letter or letters of the part you want. For example, to see what subgroup spark plugs are in you can enter the first letter or letters of the part you want. For example to see what subgroup spark plugs are in you can enter "S". PART-FINDER displays all parts beginning with that letter or as many as will fit on the screen." L0124925.  Claim 6 is anticipated by J-CON.
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	9. An electronic sourcing system comprising	9P	9. An electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors, comprising:	J-CON is an electronic sourcing system. (L0123423).	J-CON is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors  (Retail) Locating items is disclosed, e.g., at L012360: "PartFinder is J-CON's electronic parts catalog. Use it with Point-of-Sale (POS) to look up the parts a customer wants and put them on the ticket."  Purchasing items is disclosed, e.g., at L0123459 et seq. ("Start the Sale"). (Dealer) Sourcing for inventory is disclosed, e.g., at L0123681 et seq. (Purchasing and Receiving) and, e.g., at L0123964 et seq. (Inventory Information).  Multiple vendors are disclosed: "ORDER BY CODE. If the manufacturers parts are ordered from one vendor (by line) enter "L" multiple vendors (by subline), enter "S" ... If you have second and third choices for vendors enter their vendor numbers." L0125080  "Adding and Editing Vendors. Most of your vendors were added when your system was set up. When you add new vendor most prompts you receive are self-explanatory." L0125142 Claim 9 is anticipated by J-CON.
34				J-CON renders claim 9 obvious when combined with the Fisher system, King or SABRE.  Additionally, J-CON renders claim 9 obvious when combined with Doyle and the Fisher system, King or SABRE.  Additionally, J-CON renders claim 9 obvious when combined with P.O. Writer and the Fisher system, King or SABRE.  Additionally, J-CON renders claim 9 obvious when combined with Gateway and the Fisher system, King or SABRE.  Additionally, J-CON renders claim 9 obvious when combined with the IBM TV/2 system and the Fisher system, King or SABRE.	
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11	ASSERTED CLAIMS	DEPENDENCY	AS CONSTRUED	J-CON (per supplemental invalidity defenses)	Shamos opinion re J-CON
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13					
36	a collection of catalogs of items stored in an electronic format;	9a	a collection of organized collections of items and associated information, published by a vendor (which includes suppliers, manufacturers, and distributors), which preferably includes a part number, price, catalog number, vendor name, vendor ID, a textual description of the item, and images of or relating to the item stored in an electronic format;		<p>The J-CON system maintained automotive parts information from multiple manufacturers and multiple vendors in an electronic database, including such information as part number, auto make, model, and year, engine size, subassembly, product description, inventory status, price, manufacturer, distributor(s), and unit of measurement. The J-CON system included the information previously maintained by automotive parts stores in a large collection of printed automotive parts catalogs.</p> <p>"PART-FINDER is J-CONs electronic catalog system that you use together with Point-Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PARTFINDER you can forget those time consuming searches through manufacturer catalogs" L0124897.</p> <p>Changing catalogs is described at L0124922. Therefore, J-CON included a collection of catalogs.</p>
37	a first identification code associated with a first item in a first catalog;	9b	a first identification code associated with a first item in a first organized collection;		Items in J-CON can be identified by codes, such as manufacturer's code (L0123450) or part number (L0123456).
38	a second identification code associated with a second item in a second catalog, said first item and said second item being generally equivalent, and wherein a selection of one identification code from one of said first and second catalogs provides the other identification code from the other of said catalogs.	9c	a second identification code associated with a second item in a second organized collection, said first item and said second item being generally equivalent, and wherein a selection of one identification code from one of said first and second catalogs provides the other identification code from the other of said catalogs.		<p>"InterChange is J-CONs electronic cross-reference for parts. You begin InterChange by pressing InterChange from any field on the POS screen except WRKSTAT or from PartFinder." L0123450.</p> <p>"If you have PartFinder you can add InterChange to your J-CON. InterChange cross-references parts in lines you don't stock (called competitive parts) to parts in lines you do stock (called InterChange parts). InterChange can find an InterChange part even if you do not know the manufacturer or the complete part number of the competitive part." L0123601.</p> <p>"InterChange is an optional product that you use to find an equivalent (or InterChange) part for a competitive part. You start InterChange from POS or from PartFinder." L0123621.</p> <p>"InterChange enters the selected part number in the COMPETITIVE PART field so you can use it to search for cross-references." L0123628.</p>

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11	ASSERTED CLAIMS	DEPENDENCY	AS CONSTRUED	J-CON (per supplemental invalidity defenses)	Shamos opinion re J-CON
12					
13					J-CON had a sophisticated system for keeping track of equivalent items, dividing them into "Replaced Parts," "Substitute Parts," and "Can-Use Parts." L0123551. Furthermore, "Alternate Parts" and "Primary and Alternate Manufacturers" are disclosed at L0123613. A number of different methods of converting among item numbers is disclosed. Substituting an alternate part is described, e.g., at L0124837.
39					
40	21. An electronic sourcing system comprising:	21P	21. An electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors, comprising:	J-CON is an electronic sourcing system. (L0123423).	J-CON is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors  (Retail) Locating items is disclosed, e.g., at L012360: "PartFinder is J-CON's electronic parts catalog. Use it with Point-of-Sale (POS) to look up the parts a customer wants and put them on the ticket."  Purchasing items is disclosed, e.g., at L0123459 et seq. ("Start the Sale"). (Dealer) Sourcing for inventory is disclosed, e.g., at L0123681 et seq. (Purchasing and Receiving) and, e.g., at L0123964 et seq. (Inventory Information).  Multiple vendors are disclosed: "ORDER BY CODE. If the manufacturers parts are ordered from one vendor (by line) enter "L" multiple vendors (by subline), enter "S" ... If you have second and third choices for vendors enter their vendor numbers." L0125080  "Adding and Editing Vendors. Most of your vendors were added when your system was set up. When you add new vendor most prompts you receive are self-explanatory." L0125142 Claim 21 is anticipated by J-CON.
41				J-CON renders claim 21 obvious when combined with the Fisher RIMS system or the IBM TV/2 system.	
42	a requisition module including data fields, user-generated criteria entered into at least one of said data fields to generate at least partial criteria corresponding to a desired item;	21a	a requisition module including data fields, user-generated criteria entered into at least one of said data fields to generate at least partial criteria corresponding to a desired item;	J-CON included mechanisms and screen displays for entering product information that was descriptive of items in the parts database. (L0123613).	In PartSource, items can be partially described via wildcards in data fields: "With PartSource you can use wild cards if you do not know the manufacturer or part number. Wild cards are characters-asterisk and question mark-that stand for any other character that may appear in the same place. The question mark (?) replaces anyone character, and the asterisk (*) replaces zero or more characters." L0123472.  See also '172 1b.



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11	ASSERTED CLAIMS	DEPENDENCY	AS CONSTRUED		
12				J-CON (per supplemental invalidity defenses)	Shamos opinion re J-CON
13	a catalog collection searching module, said searching module including a collection of catalogs of items stored in an electronic format.	21b	an organized collection collection searching module, said searching module including a collection of organized collections of items and associated information, published by a vendor (which includes suppliers, manufacturers, and distributors), which preferably includes a part number, price, catalog number, vendor name, vendor ID, a textual description of the item, and images of or relating to the item stored in an electronic format,		<p>The J-CON system maintained automotive parts information from multiple manufacturers and multiple vendors in an electronic database, including such information as part number, auto make, model, and year, engine size, subassembly, product description, inventory status, price, manufacturer, distributor(s), and unit of measurement. The J-CON system included the information previously maintained by automotive parts stores in a large collection of printed automotive parts catalogs.</p> <p>"PART-FINDER is J-CONs electronic catalog system that you use together with Point-Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PARTFINDER you can forget those time consuming searches through manufacturer catalogs" L0124897.</p> <p>Changing catalogs is described at L0124922. Therefore, J-CON included a collection of catalogs.</p>
43	a catalog selection criteria used to select less than said entire collection,	21c	an organized collection selection criteria used to select less than said entire collection,	The J-CON system enabled a user to enter part numbers as a basis for searching the database for desired items and the results would display additional information. (L0123625).	<p>To the extent that ePlus reads the limitation to be met by Lawson's accused system, i.e., that the ability to search for products of specific vendors is sufficient, then the limitation is also met by J-CON and Lawson's prior art system.</p> <p>Searches may be limited to a particular manufacturer. "You might want to search for InterChange parts by manufacturer instead of by group. When you search by manufacturer you can select one or more manufacturers to search. To search by manufacturer press Mfgs or Enter to leave the GROUP field blank and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to search." L0123624.</p> <p>See also '516 1d.</p>
44	said searching module being used to generate additional search-module criteria for said data fields of said requisition module;	21d	said searching module being used to generate additional search-module criteria for said data fields of said requisition module;		<p>To the extent meaning can be ascribed to this limitation, the search described at L0123609 discloses generation of additional search criteria: "The Part Index is an alphabetized list of parts that gives each parts group and subgroup. There are two ways to find part in the Part Index. Press Index at the GROUP SUBGROUP or SELECTION field. At SEARCH FOR enter part or all of the part name. The more letters you enter the more accurate the search will be. At the GROUP SUBGROUP or SELECTION field type the first 1-4 letters of the part name and press Index. Whichever method you use J-CON displays the index page for parts beginning with the letters you entered. The group and subgroup or subgroups are to the left of the part name."</p>
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	ASSERTED CLAIMS	DEPENDENCY	AS CONSTRUED	J-CON (per supplemental invalidity defenses)	Shamos opinion re J-CON
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	a multiple purchase order generation module, said purchase order generation module creating multiple purchase orders from a single requisition created with said user-generated criteria and said search-module criteria;	21e	a multiple purchase order generation module, said purchase order generation module creating multiple purchase orders from a single requisition created with said user-generated criteria and said search-module criteria;	J-CON generated multiple purchase orders from a single requisition in a number of different ways. (L013617).	J-CON generated multiple purchase orders from a single requisition. "The purchasing programs enable you to quickly create purchase orders based on your real needs." L0123423.  "You can set up J-CON to automatically compute POs during EOD. You can also set it to automatically transmit POs to vendors who use A-DIS. The POs can go to primary and alternate vendors and to other vendors for whom you have set up PO control files in Function 7.7." L0123693.  Generation of multiple purchase orders is disclosed beginning at L0123695, e.g.: "When you compute a PO for primary or alternate vendor J-CON checks each manufacturer to see which ones should be ordered from the vendor. It then checks every part from each of those manufacturers to see which ones need to be ordered."
46	wherein each of at least two catalogs include a generally equivalent item from a different source, said requisition module working in combination with said catalog searching module to determine multiple sources for said item;	21f	wherein each of at least two organized collections include a generally equivalent item from a different source, said requisition module working in combination with said organized collection searching module to determine multiple sources for said item;		InterChange provides the capability to find multiple sources for generally equivalent items: "J-CON uses the manufacturer conversion tables during purchasing receiving automatic part maintenance and store-to-store inquiries. The tables can convert manufacturer codes subline numbers and price codes." L0124150.  "InterChange is an optional product that you use to find an equivalent (or InterChange) part for a competitive part. You start InterChange from POS or from PartFinder." LOI 23621. "To find an InterChange for a part the first step is to enter the part number in the COMPETITIVE PART field. The competitive part is the part for which you want to find an equivalent part." L0123622.
47	wherein said multiple sources is limited by said catalog searching module providing a match according to said user-generated criteria, said search-module criteria and a determination system that located items are generally equivalent; and	21g	wherein said multiple sources is limited by said organized collection searching module providing a match according to said user-generated criteria, said search-module criteria and a determination system that located items are generally equivalent; and	The J-CON system used a cross-reference module to determine if items are generally equivalent (assuming meaning can be given to that term). (L0123450 & L0123601).	Determination: "InterChange has a self-reference feature which is helpful to the novice counterperson who might look for an InterChange part for a line you carry. If an InterChange part is not found for the competitive part entered, InterChange checks to see you carry the competitive part." L0123628.
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11	ASSERTED CLAIMS	DEPENDENCY	AS CONSTRUED	J-CON (per supplemental invalidity defenses)	Shamos opinion re J-CON
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49	wherein said determination system includes a cross reference table matching an identification code from a first located item with a second identification code from a second located item.	21h	wherein said determination system includes a table that links vendors items determined to be equivalent between two of more different vendors matching an identification code from a first located item with a second identification code from a second located item.	The J-CON system used a cross-reference module to determine if items are generally equivalent (assuming meaning can be given to that term). (L0123450 & L0123601).	J-CON uses cross-reference tables to match identification codes: "If you use different manufacturer codes in your JIF than are in the PART-FINDER database you can cross-reference them. This enables PARTFINDER to find part information." L0124947. "Specifically you can change the manufacturer cross-reference codes so the PART-FINDER codes match the manufacturer codes you use in your JIF." L0124965. "PART-FINDER provides you with the part information you want using default manufacturer codes. However your manufacturer codes may not always match the PART-FINDER manufacturer codes. You therefore want to be sure to provide PART-FINDER with a cross-reference to the manufacturer codes you have set up in the JIF." L0124965
50	22. An electronic sourcing system as recited in claim 21, wherein said determination system includes an identical identification code for each of said located items.		22. A system as recited in claim 21, wherein said determination system includes an identical identification code for each of said located items.	The J-CON system located interchangeable part from different catalogs are associated with a "competitive part number" in the cross-referencing module InterChange. (L0123625). The JCON system renders claim 22 obvious when combined with the Fisher RIMS system or the TVI2 system.	"If you have PartFinder you can add InterChange to your J-CON. InterChange cross-references parts in lines you don't stock (called competitive parts) to parts in lines you do stock (called InterChange parts)." L0123601. "[T]ype the selection number of the InterChange part you want to use in the SELECTION field then press InterChange. InterChange enters the selected part number in the COMPETITIVE PART field so you can use it to search for cross-references." L013628. See also '516 element 9c.  This limitation has no ascertainable meaning. Nevertheless, parts that are equivalent in the J-CON system are identical unless they are identified as an alternate or replacement part: "When you enter replaced part and the quantity available is larger than the quantity ordered, J-CON displays the replacement part in the miscellaneous information section of the POS screen." L0123485.  To the extent Plaintiff alleges this claim to be infringed by Lawson's current syste, claim 22 is anticipated by J-CON.
51	29. An electronic sourcing system comprising:	29	29. An electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors, comprising:	J-CON is an electronic sourcing system. (L0123423).	J-CON is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors  (Retail) Locating items is disclosed, e.g., at L012360: "PartFinder is J-CON's electronic parts catalog. Use it with Point-of-Sale (POS) to look up the parts a customer wants and put them on the ticket."  Purchasing items is disclosed, e.g., at L0123459 et seq. ("Start the Sale"). (Dealer) Sourcing for inventory is disclosed, e.g., at L0123681 et seq. (Purchasing and Receiving) and, e.g., at L0123964 et seq. (Inventory Information).  Multiple vendors are disclosed: "ORDER BY CODE. If the manufacturers parts are ordered from one vendor (by line) enter "L" multiple vendors (by subline), enter "S" ... If you have second and third choices for vendors enter their vendor numbers." L0125080  "Adding and Editing Vendors. Most of your vendors were added when your system was set up. When you add new vendor most prompts you receive are self-explanatory." L0125142
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13				J-CON renders claim 29 obvious when combined with the Fisher RIMS system, King, P.O. Writer, SABRE or the Gateway system.	Claim 29 is anticipated by J-CON under all proposed constructions.
				Additionally, J-CON renders claim 29 obvious when combined with the IBM TV/2 system and the Fisher RIMS system, King, P.O. Writer, SABRE or Gateway.	
53	a collection of catalogs of items stored in an electronic format;	29a	a collection of organized collections of items and associated information, published by a vendor (which includes suppliers, manufacturers, and distributors), which preferably includes a part number, price, catalog number, vendor name, vendor ID, a textual description of the item, and images of or relating to the item stored in an electronic format;		<p>The J-CON system maintained automotive parts information from multiple manufacturers and multiple vendors in an electronic database, including such information as part number, auto make, model, and year, engine size, subassembly, product description, inventory status, price, manufacturer, distributor(s), and unit of measurement. The J-CON system included the information previously maintained by automotive parts stores in a large collection of printed automotive parts catalogs.</p> <p>"PART-FINDER is J-CONs electronic catalog system that you use together with Point-Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PARTFINDER you can forget those time consuming searches through manufacturer catalogs" L0124897.</p> <p>Changing catalogs is described at L0124922. Therefore, J-CON included a collection of catalogs.</p>
54	a first set of pre-determined criteria associated with said collection of catalogs;	29b	a first set of pre-determined criteria associated with said collection of organized collections;		<p>To the extent that ePlus contends the limitation to be met by Lawson's accused system, i.e., that the ability to search for products of specific vendors is sufficient, then the limitation is also met by J-CON and Lawson's prior art system.</p> <p>If "first set of pre-determined criteria" means restriction to specific catalogs, then searches may be limited by manufacturer. "You might want to search for InterChange parts by manufacturer instead of by group. When you search by manufacturer you can select one or more manufacturers to search. To search by manufacturer press Mfgs or Enter to leave the GROUP field blank and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to search." L0123624.</p>
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11	ASSERTED CLAIMS	DEPENDENCY	AS CONSTRUED	J-CON (per supplemental invalidity defenses)	Shamos opinion re J-CON
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56	a second set of pre-determined criteria associated with items from each of said catalogs;	29c	a second set of pre-determined criteria associated with items from each of said organized collections;	J-CON included mechanisms and screen displays for entering product information that was descriptive of items in the parts database. (L0123613).	<p>If "second set of pre-determined criteria" means restriction to types of items, then items can be searched by entering search criteria, including item number, item description, and commodity code, that at least partially describes a desired item. "The Part Index is an alphabetized list of parts that gives each parts group and subgroup. There are two ways to find a part in the Part Index. Press Index at the GROUP SUBGROUP or SELECTION field. At SEARCH FOR enter part or all of the part name. The more letters you enter the more accurate the search will be." L0123609.</p> <p>J-CON also provided for wildcard searching: "When you use wild card and PartSource finds more than one part that matches it displays all the parts along with their descriptions and list prices." L0123473.</p>
57	a catalog selection protocol, said catalog selection protocol relying on said first set of predetermined criteria to select less than said entire collection of catalogs, and including matching a vendor identification code with a subset of said collection of catalogs, wherein said subset of catalogs includes both a vendor catalog from a predetermined vendor and a second catalog from a predetermined third party;	29d	an organized collection selection protocol, said protocol relying on said first set of predetermined criteria to select less than said entire collection of organized collections, and including matching a vendor identification code with a set of less than all of said collection of organized collections, wherein said set includes both a vendor organized collection from a predetermined vendor and a second organized collection from a predetermined third party;		<p>"You might want to search for InterChange parts by manufacturer instead of by group. When you search by manufacturer you can select one or more manufacturers to search. To search by manufacturer press Mfgs or Enter to leave the GROUP field blank and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to search." L0123624.</p> <p>The purpose of InterChange was to allow selection from among competitive items from multiple sources.</p>
58	a search program, said search program relying on said second set of criteria to select specific items from said catalogs determined from said catalog selection protocol.	29e	a search program, said search program relying on said second set of criteria to select specific items from said organized collections determined from said organized collection selection procedure.	J-CON included a search program for matching items in a database in response to the descriptive information entered by the user. (L0123472).	<p>J-CON had a sophisticated system for keeping track of equivalent items, dividing them into "Replaced Parts," "Substitute Parts," and "Can-Use Parts." L0123551. Furthermore, "Alternate Parts" and "Primary and Alternate Manufacturers" are disclosed at L0123613. A number of different methods of converting among item numbers is disclosed. Substituting an alternate part is described, e.g., at L0124837.</p> <p>J-CON included a search program for selecting specific items. Line items (desired items) are partially described on a point-of-sale screen by specifying fields of information, e.g., manufacturer code, part number, list price, unit price and/or cost. L0123471.</p> <p>"Once you've entered the part number of the competitive part you have J-CON search for the InterChange part. You can look up InterChange parts by PartFinder group or by manufacturer." L0123623.</p> <p>See also '172 1c.</p>
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11	ASSERTED CLAIMS	DEPENDENCY	AS CONSTRUED	J-CON (per supplemental invalidity defenses)	Shamos opinion re J-CON
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60	a cross reference table linking a vendor item catalog number from said vendor with an item catalog number from said predetermined third party.	29f	a table that links vendors items determined to be equivalent between two of more different vendors linking a vendor item catalog number from said vendor with an item catalog number from said predetermined third party.	J-CON included a cross-reference module. (L0123450 & L0123601).	J-CON uses cross-reference tables to match identification codes: "If you use different manufacturer codes in your JIF than are in the PART-FINDER database you can cross-reference them. This enables PARTFINDER to find part information." L0124947. "Specifically you can change the manufacturer cross-reference codes so the PART-FINDER codes match the manufacturer codes you use in your JIF." L0124965. "PART-FINDER provides you with the part information you want using default manufacturer codes. However your manufacturer codes may not always match the PART-FINDER manufacturer codes. You therefore want to be sure to provide PART-FINDER with a cross-reference to the manufacturer codes you have set up in the JIF." L0124965
61					"If you have PartFinder you can add InterChange to your J-CON. InterChange cross-references parts in lines you don't stock (called competitive parts) to parts in lines you do stock (called InterChange parts)." L0123601. "[T]ype the selection number of the InterChange part you want to use in the SELECTION field then press InterChange. InterChange enters the selected part number in the COMPETITIVE PART field so you can use it to search for cross-references." L013628. See also '516 element 9c.
62	6833 Patent				
63	3. An electronic sourcing system comprising:	3P	3. An electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors, comprising:	J-CON is an electronic sourcing system. (L0123423).	J-CON is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors  (Retail) Locating items is disclosed, e.g., at L012360: "PartFinder is J-CON's electronic parts catalog. Use it with Point-of-Sale (POS) to look up the parts a customer wants and put them on the ticket."  Purchasing items is disclosed, e.g., at L0123459 et seq. ("Start the Sale"). (Dealer) Sourcing for inventory is disclosed, e.g., at L0123681 et seq. (Purchasing and Receiving) and, e.g., at L0123964 et seq. (Inventory Information).  Multiple vendors are disclosed: "ORDER BY CODE. If the manufacturers parts are ordered from one vendor (by line) enter "L" multiple vendors (by subline), enter "S" ... If you have second and third choices for vendors enter their vendor numbers." L0125080  "Adding and Editing Vendors. Most of your vendors were added when your system was set up. When you add new vendor most prompts you receive are self-explanatory." L0125142 Claim 3 is anticipated by J-CON.
64				J-CON renders claim 3 obvious when combined with the Fisher RIMS system, King, P.O. Writer, SABRE, or the Gateway system.  Additionally, J-CON renders claim 3 obvious when combined with Doyle and the Fisher RIMS system, King, P.O. Writer, SABRE, or the Gateway system.  Additionally, the J-CON system renders claim 3 obvious when combined with the IBM TV/2 system and the Fisher RIMS system, King, P.O. Writer, SABRE, or the Gateway system.	



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65	at least two product catalogs containing data relating to items associated with the respective sources;	3a	at least two organized collections of items and associated information, published by a vendor (which includes suppliers, manufacturers, and distributors), which preferably includes a part number, price, catalog number, vendor name, vendor ID, a textual description of the item, and images of or relating to the item containing data relating to items associated with the respective sources;		<p>The J-CON system maintained automotive parts information from multiple manufacturers and multiple vendors in an electronic database, including such information as part number, auto make, model, and year, engine size, subassembly, product description, inventory status, price, manufacturer, distributor(s), and unit of measurement. The J-CON system included the information previously maintained by automotive parts stores in a large collection of printed automotive parts catalogs.</p> <p>"PART-FINDER is J-CON's electronic catalog system that you use together with Point-Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PARTFINDER you can forget those time consuming searches through manufacturer catalogs" L0124897.</p> <p>Changing catalogs is described at L0124922. Therefore, J-CON included a collection of catalogs.</p>
66	means for selecting the product catalogs to search;	3b	<p>Function: to select the organized collections to search</p> <p>Structure: search programs and modules operating on a computer system with access to data in a database or other file system, and their equivalents. See e.g., '683 Patent at 4:1-6:38; 7:61-12:37; FIGS. 1-2; APP. III-V and VII (describing local computer 20, search program 50, TV/2, and search program 250)</p> <p>SAME STRUCTURE AS IN MEANS IN '172 1 AND '683 6</p>		<p>To the extent that ePlus contends the limitation to be met by Lawson's accused system, i.e., that the ability to search for products of specific vendors is sufficient, then the limitation is also met by JCON and Lawson's prior art system. Under this theory, JCON discloses a means for selecting organized collections to search.</p> <p>"You might want to search for InterChange parts by manufacturer instead of by group. When you search by manufacturer you can select one or more manufacturers to search. To search by manufacturer press Mfgs or Enter to leave the GROUP field blank and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to search." L0123624.</p> <p>The purpose of InterChange was to allow selection from among competitive items from multiple sources.</p>
67	means for searching for matching items among the selected product catalogs;	3c	<p>Function: searching for search results among the selected product catalogs</p> <p>Structure: search programs and modules operating on a computer system with access to data in a database or other file system, and their equivalents. See e.g., '683 Patent at 4:1-6:38; 7:61-12:37; FIGS. 1-2; APP. III-V and VII (describing local computer 20, search program 50, TV/2, and search program 250)</p> <p>NOTE: SAME AS MEANS IN '172 1, '683 6</p>	J-CON included a search program for matching items in a database in response to the descriptive information entered by the user. (L0123472).	<p>The reference discloses a means for searching for search results (a search program) that match the entered product information in the selected portions of the database: "PART-FINDER is J-CON's electronic catalog system that you use together with Point-Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PARTFINDER, you can forget those time-consuming searches through manufacturer catalogs. Instead, you can look up parts in seconds with just a few clicks of the keyboard. When you find what your customer wants, PART-FINDER puts the parts on the ticket for you." L0124897. A list of responsive search results is shown at L0124911.</p> <p>A database is disclosed for searching: "You use PART-FINDER Maintenance to customize and update your PART-FINDER database." L0124947</p>



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11	ASSERTED CLAIMS	DEPENDENCY	AS CONSTRUED	J-CON (per supplemental invalidity defenses)	Shamos opinion re J-CON
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	means for building a requisition using data relating to selected matching items and their associated source(s);	3d	<p>Function: building a requisition using data relating to selected matching items and their associated source(s).</p> <p>Structure: requisition module operating on a computer system having access to data in the database, and its equivalents. See e.g., '683 Patent at 1:25-35; 3:3-19; 6:40-65; 7:36-8:14; 15:46-49; FIGS. 1-3 (describing various embodiments of requisition modules including requisition/purchasing system 40, requisition management ("REQI") module 44A and requisition maintenance program 44C)</p> <p>NOTE: SAME AS MEANS IN '172 1 and '683 6</p>	J-CON enabled a user to select items to add to a requisition (ticket). (L0123606).	<p>The reference discloses a means for building a requisition that uses data obtained from said database relating to requisition items on said list of desired catalog items.</p> <p>The reference discloses transferring data relating to selected search results (from a browse window) to a requisition module that creates a "purchase request." L0127931. A requisition (called a "supply request" or a "purchase request" in the reference) is built from the selected items in the browse window. L0127970.</p>
68	means for processing the requisition to generate one or more purchase orders for the selected matching items; and	3e	<p>Function: processing the requisition to generate one or more purchase orders for the selected matching items</p> <p>Structure: purchase order generation module operating on a computer system having access to the requisition; and its equivalents. See e.g., '683 Patent at 1:37-59; 3:3-24; 10:43-54; 15:20-59, FIGS. 1-3 (describing systems and processes that operate to generate purchase orders including requisition/purchasing system 40)</p> <p>NOTE SAME AS MEANS IN '172 1, '683 6</p>	J-CON could be configured to process purchase orders manually or automatically. (L0123693-99).	<p>The reference discloses a means for processing a requisition to generate purchase orders for requisition items.</p> <p>A purchase order generation module for generating purchase orders is disclosed at L0125131-3, e.g., "Once you fine-tune the buying instructions that you've set up for J-CON you can let J-CON automatically compute and send POs during End-of-Day EOD." L0125131. "You can set up J-CON to automatically compute POs during EOD. You can also set it to automatically transmit POs to vendors who use A-DIS." L0123693</p> <p>The module has access to the requisition (ticket): "When you compute PO for primary or alternate vendor J-CON checks each manufacturer to see which ones should be ordered from the vendor. It then checks every part from each of those manufacturers to see which ones need to be ordered." L0123695</p>
69	means for converting data related to a selected matching item and an associated source to data relating to an item and a different source.	3f	<p>Function: converting data relating to a selected matching item and an associated source to data relating to an item and a different source</p> <p>Structure: one or more non-catalog databases identifying cross-referenced items, identical items, or generally equivalent items; one or more cross-reference tables or file identifying cross-referenced items, identical items or generally equivalent items; one or more codes corresponding to cross-referenced items, identical items or generally equivalent items; and their equivalents. See e.g. '683 Patent at 4:60-5:8; 10:43-54; 14:35-45; 16:14-32; 17:19-54, Appendices VIII-X.</p> <p>NOTE: SAME MEANS IN BOTH '683 3 AND 6</p>	The J-CON system located interchangeable part from different catalogs are associated with a "competitive part number" in the cross-referencing module InterChange. (L0123625).	<p>The reference discloses a means for converting data relating to a selected matching item and an associated source to data relating to an item and a different source.</p> <p>To the extent that ePlus contends that UNSPSC codes in Lawson's accused system designate "generally equivalent" items, this limitation is also disclosed in J-CON and in Lawson's prior art system.</p> <p>The reference discloses maintaining a cross-reference table (non-catalog database) or file identifying cross-referenced items: "InterChange is an optional product that you use to find an equivalent (or InterChange) part for a competitive part. You start InterChange from POS or from PartFinder." L0123621. J-CON uses cross-reference tables to match identification codes: "If you use different manufacturer codes in your JIF than are in the PART-FINDER database you can cross-reference them. This enables PARTFINDER to find part information." L0124947.</p>
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13					<p>"If you have PartFinder you can add InterChange to your J-CON. InterChange cross-references parts in lines you don't stock (called competitive parts) to parts in lines you do stock (called InterChange parts)." L0123601.</p> <p>"[T]ype the selection number of the InterChange part you want to use in the SELECTION field then press InterChange. InterChange enters the selected part number in the COMPETITIVE PART field so you can use it to search for cross-references." L013628.</p> <p>See also '516 element 9c.</p>
71	6. An electronic sourcing system comprising:	6P	6. An electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors, comprising:	J-CON is an electronic sourcing system. (L0123423).	<p>J-CON is an electronic system for use by a prospective buyer to locate and find items to purchase from sources, suppliers or vendors</p> <p>(Retail) Locating items is disclosed, e.g., at L012360: "PartFinder is J-CON's electronic parts catalog. Use it with Point-of-Sale (POS) to look up the parts a customer wants and put them on the ticket."</p> <p>Purchasing items is disclosed, e.g., at L0123459 et seq. ("Start the Sale"). (Dealer) Sourcing for inventory is disclosed, e.g., at L0123681 et seq. (Purchasing and Receiving) and, e.g., at L0123964 et seq. (Inventory Information).</p> <p>Multiple vendors are disclosed: "ORDER BY CODE. If the manufacturers parts are ordered from one vendor (by line) enter "L" multiple vendors (by subline), enter "S" .... If you have second and third choices for vendors enter their vendor numbers." L0125080</p> <p>"Adding and Editing Vendors. Most of your vendors were added when your system was set up. When you add new vendor most prompts you receive are self-explanatory." L0125142</p> <p>Claim 6 is anticipated by J-CON.</p>
72				The J-CON system anticipates claim 6.	
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74	a database containing data relating to items associated with at least two sources;	6a	a database containing data relating to items associated with at least two sources;	The J-CON system includes a database of items from both primary and alternative manufacturers. (L0123613).	<p>The J-CON system maintained automotive parts information from multiple manufacturers and multiple vendors in an electronic database, including such information as part number, auto make, model, and year, engine size, subassembly, product description, inventory status, price, manufacturer, distributor(s), and unit of measurement. The J-CON system included the information previously maintained by automotive parts stores in a large collection of printed automotive parts catalogs.</p> <p>"PART-FINDER is J-CON's electronic catalog system that you use together with Point-Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PARTFINDER you can forget those time consuming searches through manufacturer catalogs" L0124897.</p> <p>Changing catalogs is described at L0124922. Therefore, J-CON included a collection of catalogs.</p>
75	means for searching for matching items in the database;	6b	<p>Function: searching for search results in the database</p> <p>Structure: search programs and modules operating on a computer system with access to data in a database or other file system, and their equivalents. See e.g., '683 Patent at 4:1-6:38; 7:61-12:37; FIGS. 1-2; APP. III-V and VII (describing local computer 20, search program 50, TV/2, and search program 250)</p> <p>NOTE: SAME AS MEANS IN '172 1, '683 3</p>	J-CON included a search program for matching items in a database in response to the descriptive information entered by the user. (L0123472).	<p>The reference discloses a means for searching for search results (a search program) that match the entered product information in the selected portions of the database: "PART-FINDER is J-CON's electronic catalog system that you use together with Point-Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PARTFINDER, you can forget those time-consuming searches through manufacturer catalogs. Instead, you can look up parts in seconds with just a few clicks of the keyboard. When you find what your customer wants, PART-FINDER puts the parts on the ticket for you." L0124897. A list of responsive search results is shown at L0124911.</p> <p>A database is disclosed for searching: "You use PART-FINDER Maintenance to customize and update your PART-FINDER database." L0124947</p>
76	means for building a requisition using data relating to selected matching items and their associated source(s);	6c	<p>Function: building a requisition using data relating to selected matching items and their associated source(s).</p> <p>Structure: requisition module operating on a computer system having access to data in the database, and its equivalents. See e.g., '683 Patent at 1:25-35; 3:3-19; 6:40-65; 7:36-8:14; 15:46-49; FIGS. 1-3 (describing various embodiments of requisition modules including requisition/purchasing system 40, requisition management ("REQI") module 44A and requisition maintenance program 44C)</p> <p>NOTE: SAME AS MEANS IN '172 1 and '683 3</p>	J-CON enabled a user to select items to add to a requisition (ticket). (L0123606).	<p>The reference discloses a means for building a requisition that uses data obtained from said database relating to requisition items on said list of desired catalog items.</p> <p>The reference discloses transferring data relating to selected search results (from a browse window) to a requisition module that creates a "purchase request." L0127931. A requisition (called a "supply request" or a "purchase request" in the reference) is built from the selected items in the browse window. L0127970.</p>



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	ASSERTED CLAIMS	DEPENDENCY	AS CONSTRUED	J-CON (per supplemental invalidity defenses)	Shamos opinion re J-CON
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	means for processing the requisition to generate one or more purchase orders for the selected matching items; and	6d	<p>Function: processing the requisition to generate one or more purchase orders for the selected matching items</p> <p>Structure: purchase order generation module operating on a computer system having access to the requisition; and its equivalents. See e.g., '683 Patent at 1:37-59; 3:324; 10:43-54; 15:20-59, FIGS. 1-3 (describing systems and processes that operate to generate purchase orders including requisition/purchasing system 40)</p> <p>NOTE SAME AS MEANS IN '172 1, '683 3</p>	J-CON could be configured to process purchase orders manually or automatically. (L0123693-99).	<p>The reference discloses a means for processing a requisition to generate purchase orders for requisition items.</p> <p>A purchase order generation module for generating purchase orders is disclosed at L0125131-3, e.g., "Once you fine-tune the buying instructions that you've set up for J-CON you can let J-CON automatically compute and send POs during End-of-Day EOD." L0125131. "You can set up J-CON to automatically compute POs during EOD. You can also set it to automatically transmit POs to vendors who use A-DIS." L0123693</p> <p>The module has access to the requisition (ticket): "When you compute PO for primary or alternate vendor J-CON checks each manufacturer to see which ones should be ordered from the vendor. It then checks every part from each of those manufacturers to see which ones need to be ordered." L0123695</p>
77	means for converting data related to a selected matching item and an associated source to data relating to an item and a different source.	6e	<p>Function: converting data relating to a selected matching item and an associated source to data relating to an item and a different source</p> <p>Structure: one or more non-catalog databases identifying cross-referenced items, identical items, or generally equivalent items; one or more cross-reference tables or file identifying cross-referenced items, identical items or generally equivalent items; one or more codes corresponding to cross-referenced items, identical items or generally equivalent items; and their equivalents. See e.g. '683 Patent at 4:60-5:8; 10:43-54; 14:35-45; 16:14-32; 17:19-54, Appendices VIII-X.</p> <p>NOTE: SAME MEANS IN BOTH '683 3 AND 6</p>	The J-CON system located interchangeable part from different catalogs are associated with a "competitive part number" in the cross-referencing module InterChange. (L0123625).	<p>The reference discloses a means for converting data relating to a selected matching item and an associated source to data relating to an item and a different source.</p> <p>To the extent that ePlus contends that UNSPSC codes in Lawson's accused system designate "generally equivalent" items, this limitation is also disclosed in J-CON and in Lawson's prior art system.</p> <p>The reference discloses maintaining a cross-reference table (non-catalog database) or file identifying cross-referenced items: "InterChange is an optional product that you use to find an equivalent (or InterChange) part for a competitive part. You start InterChange from POS or from PartFinder." L0123621. J-CON uses cross-reference tables to match identification codes: "If you use different manufacturer codes in your JIF than are in the PART-FINDER database you can cross-reference them. This enables PARTFINDER to find part information." L0124947.</p>
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					<p>"If you have PartFinder you can add InterChange to your J-CON. InterChange cross-references parts in lines you don't stock (called competitive parts) to parts in lines you do stock (called InterChange parts)." L0123601.</p> <p>"[T]ype the selection number of the InterChange part you want to use in the SELECTION field then press InterChange. InterChange enters the selected part number in the COMPETITIVE PART field so you can use it to search for cross-references." L013628.</p> <p>See also '516 element 9c.</p>
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11	ASSERTED CLAIMS	DEPENDENCY	AS CONSTRUED	J-CON (per supplemental invalidity defenses)	Shamos opinion re J-CON
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80	26. A method comprising the steps of:	26P	26. A method comprising the steps of:	<p>The J-CON system renders claim 26 obvious when combined with the Fisher RIMS system, King, P.O. Writer, SABRE, or the Gateway system.</p> <p>Additionally, the J-CON system renders claim 26 obvious when combined with Doyle and the Fisher RIMS system, King, P.O. Writer, SABRE, or the Gateway system.</p>	<p>The reference discloses a method.</p> <p>Claim 26 is anticipated by J-CON, as shown below.</p>
81	maintaining at least two products catalogs on a database containing data relating to items associated with the respective sources;	26a	maintaining at least two organized collections of items and associated information, published by a vendor (which includes suppliers, manufacturers, and distributors), which preferably includes a part number, price, catalog number, vendor name, vendor ID, a textual description of the item, and images of or relating to the item on a database containing data relating to items associated with the respective sources;		<p>The J-CON system maintained automotive parts information from multiple manufacturers and multiple vendors in an electronic database, including such information as part number, auto make, model, and year, engine size, subassembly, product description, inventory status, price, manufacturer, distributor(s), and unit of measurement. The J-CON system included the information previously maintained by automotive parts stores in a large collection of printed automotive parts catalogs.</p> <p>"PART-FINDER is J-CONs electronic catalog system that you use together with Point-Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PARTFINDER you can forget those time consuming searches through manufacturer catalogs" L0124897.</p> <p>Changing catalogs is described at L0124922. Therefore, J-CON included a collection of catalogs.</p>
82	selecting the product catalogs to search;	26b	selecting the organized collections to search;		<p>To the extent that ePlus reads the limitation to be met by Lawson's accused system, i.e., that the ability to search for products of specific vendors is sufficient, then the limitation is also met by J-CON and Lawson's prior art system.</p> <p>Searches may be limited to a particular manufacturer. "You might want to search for InterChange parts by manufacturer instead of by group. When you search by manufacturer you can select one or more manufacturers to search. To search by manufacturer press Mfgs or Enter to leave the GROUP field blank and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to search." L0123624.</p> <p>See also *516 1d.</p>



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	ASSERTED CLAIMS	DEPENDENCY	AS CONSTRUED		
11				J-CON (per supplemental invalidity defenses)	Shamos opinion re J-CON
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13	searching for matching items among the selected product catalogs;	26c	searching for search results among the selected organized collections;	J-CON included a search program for matching items in a database in response to the descriptive information entered by the user. (L0123472).	"The Part Index is an alphabetized list of parts that gives each parts group and subgroup. There are two ways to find part in the Part Index. Press Index at the GROUP SUBGROUP or SELECTION field. At SEARCH FOR enter part or all of the part name. The more letters you enter the more accurate the search will be. At the GROUP SUBGROUP or SELECTION field type the first 1-4 letters of the part name and press Index. Whichever method you use J-CON displays the index page for parts beginning with the letters you entered. The group and subgroup or subgroups are to the left of the part name." L0123609.  See also '172 1c.
83	building a requisition using data relating to selected matching items and their associated source(s);	26d	building a requisition using data relating to requisition items and their associated source(s);	J-CON enabled a user to select items to add to a requisition (ticket). (L0123606).	The reference discloses transferring data relating to selected matching items to a requisition program: "When you return to Point-Of-Sale from PART-FINDER, J-CON automatically places all parts you selected with PART-FINDER on a ticket." L0124919.  The ticket causes a requisition for parts needed by a customer to be generated (built) when the ticket is finalized: "Only when the held ticket is finalized does J-CON process it." L0124797.  See also '172 1e, '683 3d.
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85	processing the requisition to generate one or more purchase orders for the selected matching items; and	26e	processing the requisition to generate one or more purchase orders for the requisition items; and	J-CON could be configured to process purchase orders manually or automatically. (L0123693-99).	J-CON generated multiple purchase orders from a single requisition. "The purchasing programs enable you to quickly create purchase orders based on your real needs." L0123423.  "You can set up J-CON to automatically compute POs during EOD. You can also set it to automatically transmit POs to vendors who use A-DIS. The POs can go to primary and alternate vendors and to other vendors for whom you have set up PO control files in Function 7.7." L0123693.  Generation of multiple purchase orders is disclosed beginning at L0123695, e.g.: "When you compute a PO for primary or alternate vendor J-CON checks each manufacturer to see which ones should be ordered from the vendor. It then checks every part from each of those manufacturers to see which ones need to be ordered."  See also '172 1f.
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11	ASSERTED CLAIMS	DEPENDENCY	AS CONSTRUED		
12				J-CON (per supplemental invalidity defenses)	Shamos opinion re J-CON
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	determining whether a selected matching item is available in inventory.	26f	determining whether a requisition item is available in inventory.	The J-CON system enabled a user to determine whether and how many of a particular item was available in stock. (L0123608 & L0123612).	<p>*In POS you can check a stocking part's available quantity, stock quantity, and price levels. ... With inventory inquiry, you can check stocking parts prices and availability.* L0125060. The steps of determining whether a matching item is in inventory are shown at L0125060. See also "Warehouse inquiry" at L0125061.</p> <p>*JIF Inquiry gives you inventory information about parts in your JIF. You begin JIF Inquiry by pressing JIF Inquiry from any field on the POS screen except WRKSTAT.* L0123450.</p> <p>*Warehouse Inquiry gives you inventory information about parts at your serving warehouse. You begin Warehouse Inquiry by pressing &lt;Whse Inquiry&gt; from any field on the POS screen except WRKSTAT.* L0123451. Inventory inquiry is described in detail starting at L0123541.</p>
87	28. A method comprising the steps of:	28P	28. A method comprising the steps of:	<p>The J-CON system renders claim 28 obvious when combined with the Fisher RIMS system, King, P.O. Writer, SABRE, or the Gateway system.</p> <p>Additionally, the J-CON system renders claim 28 obvious when combined with Doyle and the Fisher RIMS system, King, P.O. Writer, SABRE, or the Gateway system.</p> <p>Additionally, the J-CON system renders claim 28 obvious when combined with the IBM TV/2 system and the Fisher RIMS system, Doyle, P.O. Writer, SABRE, or the Gateway system.</p>	<p>The reference discloses a method.</p> <p>Claim 28 is anticipated by J-CON, as shown below.</p>
88	maintaining at least two products catalogs on a database containing data relating to items associated with the respective sources;	28a	maintaining at least two organized collections of items and associated information, published by a vendor (which includes suppliers, manufacturers, and distributors), which preferably includes a part number, price, catalog number, vendor name, vendor ID, a textual description of the item, and images of or relating to the item on a database containing data relating to items associated with the respective sources;		<p>The J-CON system maintained automotive parts information from multiple manufacturers and multiple vendors in an electronic database, including such information as part number, auto make, model, and year, engine size, subassembly, product description, inventory status, price, manufacturer, distributor(s), and unit of measurement. The J-CON system included the information previously maintained by automotive parts stores in a large collection of printed automotive parts catalogs.</p> <p>*PART-FINDER is J-CON's electronic catalog system that you use together with Point-Of-Sale. You use PART-FINDER to look up parts and Point-Of-Sale to sell them. With PARTFINDER you can forget those time consuming searches through manufacturer catalogs* L0124897.</p> <p>Changing catalogs is described at L0124922. Therefore, J-CON included a collection of catalogs.</p>
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	A	B	E	R	S
11	ASSERTED CLAIMS	DEPENDENCY	AS CONSTRUED		
12				J-CON (per supplemental invalidity defenses)	Shamos opinion re J-CON
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90	selecting the product catalogs to search;	28b	selecting the organized collections to search;		<p>To the extent that ePlus reads the limitation to be met by Lawson's accused system, i.e., that the ability to search for products of specific vendors is sufficient, then the limitation is also met by J-CON and Lawson's prior art system.</p> <p>Searches may be limited to a particular manufacturer. "You might want to search for InterChange parts by manufacturer instead of by group. When you search by manufacturer you can select one or more manufacturers to search. To search by manufacturer press Mfgs or Enter to leave the GROUP field blank and go to the MFGS TO SEARCH field. Then enter the codes of the manufacturers whose InterChange catalogs you want to search." L0123624.</p> <p>See also '516 1d.</p>
91	searching for matching items among the selected product catalogs;	28c	searching for search results among the selected organized collections;	J-CON included a search program for matching items in a database in response to the descriptive information entered by the user. (L0123472).	<p>"The Part Index is an alphabetized list of parts that gives each parts group and subgroup. There are two ways to find part in the Part Index. Press Index at the GROUP SUBGROUP or SELECTION field. At SEARCH FOR enter part or all of the part name. The more letters you enter the more accurate the search will be. At the GROUP SUBGROUP or SELECTION field type the first 1-4 letters of the part name and press Index. Whichever method you use J-CON displays the index page for parts beginning with the letters you entered. The group and subgroup or subgroups are to the left of the part name." L0123609.</p> <p>See also '172 1c.</p>
92	building a requisition using data relating to selected matching items and their associated source(s);	28d	building a requisition using data relating to requisition items and their associated source(s);	J-CON enabled a user to select items to add to a requisition (ticket). (L0123606).	<p>The reference discloses transferring data relating to selected matching items to a requisition program: "When you return to Point-Of-Sale from PART-FINDER, J-CON automatically places all parts you selected with PART-FINDER on a ticket." L0124919.</p> <p>The ticket causes a requisition for parts needed by a customer to be generated (built) when the ticket is finalized: "Only when the held ticket is finalized does J-CON process it." L0124797.</p> <p>See also '172 1e, '683 3d.</p>

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11	ASSERTED CLAIMS	DEPENDENCY	AS CONSTRUED	J-CON (per supplemental invalidity defenses)	Shamos opinion re J-CON
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93	processing the requisition to generate one or more purchase orders for the selected matching items; and	28e	processing the requisition to generate one or more purchase orders for the requisition items; and	J-CON could be configured to process purchase orders manually or automatically. (L0123693-99).	<p>J-CON generated multiple purchase orders from a single requisition. "The purchasing programs enable you to quickly create purchase orders based on your real needs." L0123423.</p> <p>"You can set up J-CON to automatically compute POs during EOD. You can also set it to automatically transmit POs to vendors who use A-DIS. The POs can go to primary and alternate vendors and to other vendors for whom you have set up PO control files in Function 7.7." L0123693.</p> <p>Generation of multiple purchase orders is disclosed beginning at L0123695, e.g.: "When you compute a PO for primary or alternate vendor J-CON checks each manufacturer to see which ones should be ordered from the vendor. It then checks every part from each of those manufacturers to see which ones need to be ordered."</p> <p>See also '172 1f.</p>
94	converting data relating to a selected matching item and an associated source to data relating to an item and a different source.	28f	substituting data relating to a requisition item and an associated source to data relating to an item and a different source.	The J-CON system located interchangeable part from different catalogs are associated with a "competitive part number" in the cross-referencing module InterChange. (L0123625).	<p>"Manufacturer conversion tables help your J-CON communicate with other computer systems that don't use the same manufacturer codes, sublines or pricing codes that you use. For example, your serving warehouse might use the manufacturer code DG for Detroit Gaskets while you use the code DET. The manufacturer conversion table converts the warehouses code to your J-CON code." L0124150.</p> <p>"J-CON uses two types of conversion tables, vendor-specific and default. When communicating with another system, J-CON first looks to see if a table exists for the specific vendor and store. If there is not a vendor-specific conversion table, J-CON uses the default conversion table." L0124152.</p>
95					<p>J-CON had a sophisticated system for keeping track of equivalent items, dividing them into "Replaced Parts," "Substitute Parts," and "Can-Use Parts." L0123551. Furthermore, "Alternate Parts" and "Primary and Alternate Manufacturers" are disclosed at L0123613. A number of different methods of converting among item numbers is disclosed. Substituting an alternate part is described, e.g., at L0124837.</p>



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11	ASSERTED CLAIMS	DEPENDENCY	AS CONSTRUED	J-CON (per supplemental invalidity defenses)	Shamos opinion re J-CON
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96	29. The method of claim 28 further comprising the step of determining whether a selected matching item is available in inventory.		29. The method of claim 28 further comprising the step of determining whether a requisition item is available in inventory.	The J-CON system enabled a user to determine whether and how many of a particular item was available in stock. (L0123608 & L0123612).	<p>"In POS you can check a stocking part's available quantity, stock quantity, and price levels. ... With inventory inquiry, you can check stocking parts prices and availability." L0125060. The steps of determining whether a matching item is in inventory are shown at L0125060. See also "Warehouse inquiry" at L0125061.</p> <p>"JIF Inquiry gives you inventory information about parts in your JIF. You begin JIF Inquiry by pressing JIF Inquiry from any field on the POS screen except WRKSTAT." L0123450.</p> <p>"Warehouse Inquiry gives you inventory information about parts at your serving warehouse. You begin Warehouse Inquiry by pressing &lt;Whse Inquiry&gt; from any field on the POS screen except WRKSTAT." L0123451. Inventory inquiry is described in detail starting at L0123541.</p>
97				The J-CON system renders claim 29 obvious when combined with the other cited prior art references as described with respect to claim 28.	Claim 29 is anticipated by J-CON.